UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

SEP 02 2014

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert Anthony
Environmental Manager
Chemical Waste Management
36964 Alabama Highway 17 North
Emelle, Alabama 36619

SUBJ: RCRA Compliance Evaluation Inspection
Chemical Waste Management
EPA ID# ALD000622464

Dear Mr. Anthony:

Enclosed is a copy of the U.S. Environmental Protection Agency inspection report documenting the results of the April 15-17, 2014, inspection of Chemical Waste Management located at 36964 Alabama Highway 17 North in Emelle, Alabama. This was an EPA Compliance Evaluation Inspection (CEI) for the purpose of evaluating the facility's compliance with the applicable Resource Conservation and Recovery Act (RCRA) regulations.

Enclosed is the CEI report that indicates that apparent deficiencies of RCRA were discovered. A copy of this report has been forwarded to the Alabama Department of Environmental Protection (ADEM).

If you have any questions regarding this matter, please contact Paula Whiting by phone at (404) 562-9277 or by email at whiting.paula@epa.gov.

Sincerely,

Larry L. Lamberth
Chief, South Enforcement and Compliance Section
RCRA and OPA Enforcement and Compliance Branch

Enclosure

cc: Jonah Harris, ADEM (sent via e-mail)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

SEP 02 2014

Vernon H. Crockett
Chief, Industrial Hazardous Waste Branch
Land Division
Alabama Department of Environmental Management
1400 Coliseum Boulevard
Montgomery, Alabama 36110-2059

SUBJ: RCRA Compliance Evaluation Inspection
Chemical Waste Management
EPA ID# ALD000622464

Dear Mr. Crockett:

On April 15-17, 2014, a U.S. Environmental Protection Agency Compliance Evaluation Inspection was conducted at Chemical Waste Management in Emelle, Alabama, to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA).

Enclosed is the CEI report that documents apparent violations of RCRA. The EPA considers this facility to be a Secondary Violator.

If you have any questions regarding this matter, please contact Paula Whiting by phone at (404) 562-9277 or by email at whiting.paula@epa.gov.

Sincerely,

Larry L. Lamberth
Chief, South Enforcement and Compliance Section
RCRA and OPA Enforcement and Compliance Branch

Enclosure

RCRA Inspection Report

1) Inspector and Author of the Report

Paula A. Whiting
Environmental Engineer
RCRA and OPA Enforcement and Compliance Branch
US EPA Region 4 SNAFC – 10th Floor
61 Forsyth Street, SW
Atlanta, Georgia 30303
whiting.paula@epa.gov
(404) 562-9277

2) Facility Information

Chemical Waste Management
36964 Alabama Highway 17 North
Emelle, Alabama 36619
Sumter County
EPA ID# ALD000622464

3) Responsible Official

Robert Anthony, Environmental Manager

4) Inspection Participants

Robert Anthony	Chemical Waste Management
Nelson Sturdivant	Chemical Waste Management
Guy Coughlin	Chemical Waste Management
Linda Knickerbocker	ADEM
Corey Holmes	ADEM
Dustin Land	ADEM
Brad Johnson	ADEM
Lynn Roper	ADEM
Clethes Stallworth	ADEM
Ray Terhune	US EPA Region 4
Robert Stewart	US EPA Region 4
Houston Gilliand	US EPA Region 4
Paula Whiting	US EPA Region 4

5) Date and Time of Inspection

April 15-17, 2014, at 8 a.m. CST

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA), 42 U.S.C.A. §§ 6901 to 6992

Sections 3005 and 3007 of RCRA, 42 U.S.C.A. §§6925 and 6927

40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273, and 279

ADEM Administrative Code 335 Division 14

ADEM Hazardous Waste Permit Number ALD000622464

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the Chemical Waste Management' (CWM Emelle), EPA ID# ALD000622464, compliance with the applicable regulations.

8) Facility Description

Chemical Waste Management, Inc. in Emelle, Alabama, is a permitted commercial hazardous waste and chemical waste treatment, storage, and disposal facility. CWM Emelle accepts hazardous and polychlorinated biphenyl (PCB) wastes in both containers and bulk shipments. The facility receives wastes from many manufacturing sectors and federal and state clean-up projects. Hazardous wastes received by the facility may be blended and bulked prior to being shipped off-site for further treatment or recovery, decanted and stored prior to shipment offsite, processed prior to on-site landfilling or off-site disposal, or placed directly in the on-site landfill depending on the applicable treatment standards. CWM Emelle was issued a Hazardous Waste Permit renewal on September 16, 2010.

CWM Emelle is located on 2,007 acres with 650 active acres, employs approximately 52 people, and operates 5 days per week, 8 hours per day.

CWM Emelle's most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated February 7, 2014, characterized the facility as a large quantity generator (LQG) of hazardous waste, a commercial treatment, storage and disposal facility, a transporter, a large quantity handler of universal waste, and a used oil generator.

Currently, CWM Emelle generates used oil, universal wastes, paint and solvent waste, lab waste and other wastes which include EPA Waste Codes D001-D043, F001-F039, K-listed, P-listed and U-listed wastes.

9) Previous Inspection History

On April 2, 2012, ADEM conducted a compliance evaluation inspection and eight apparent violations were found at the time of the inspection. The violations returned to compliance on July 19, 2012 after a warning letter was issued.

10) Findings

Upon arriving at the CWM Emelle facility, the inspectors presented their credentials to the security guard and signed in. The inspectors then presented their credentials to Robert Anthony, Environmental Manager at 9:20 a.m. CDT on April 15, 2014. At the opening conference, a brief explanation for the purpose of the inspection was given, introductions of the inspectors were conducted, and a description of the facility operations was requested. The inspectors requested a tour of the facility. The inspectors then performed a walk-through inspection of the facility. Below is a description of the observations made during the walk-through.

10.1. Robbie D Wood 10-Day Storage Yard

Incoming roll-offs are stored by Robbie D. Wood, Inc. (RDW) (EPA ID# ALD067138891), a hazardous waste transporter, in the 10-day storage yard prior to being moved to the CWM Emelle facility. The property for the storage yard is owned by CWM Emelle and leased to RDW. At the time of the inspection, the inspectors observed the yard was fenced in and contained empty roll-offs and incoming roll-offs separated into opposite isles (Pictures 1-14). The incoming roll-offs had hazardous waste labels listing the generator, the EPA ID number and the manifest number. A metal building near the front entrance contained the records log.

Mr. Nelson Sturdivant provided the roll-off records for review. The inspectors observed that Roll-off 841 was logged in on March 30, 2014 and logged out on April 11, 2014, and thereby exceeding the 10-day transporter storage time. The inspectors also observed that the log was not clearly written or easy to understand.

CWM Emelle is in apparent violation of ADEM Administrative Code R. 335-14-4-.05(3)(b) [40 C.F.R. § 263.12]. Transfer facilities that store hazardous waste for more than 10 days are subject to regulation as a storage facility under Chapters 335-14-5, 335-14-6, 335-14-8, and 335-14-9.

10.2. Bulking Sampling Area PK1000

The Bulk Storage Sampling Area is used to sample untreated and treated roll-offs, and tanks prior to disposal in the landfill. Seven roll-offs and six trucks waiting were waiting for sampling results from the lab (Picture 15-18). Mr. Sturdivant explained that the area is used as a one-day storage and if the roll-offs are processed on that day, the roll-offs they come in are not relabeled but use the label the original generator placed on the side. The trucks are processed the day they come in, because of the independent drivers. The inspectors observed at the time of the inspection, that the waiting trucks were not placarded.

The trucks and the roll-offs are driven inside a metal enclosure where samples are taken (Pictures 19-24). At the time of the inspection, the inspectors observed four 55-gallon drums. Two of the drums were inside plastic secondary containment. These drums were full, had a hazardous waste label, marked "rinse" and "wash" and dated March 8, 2014. When asked, Mr. Sturdivant explained that the rinse and wash drums were pre-labeled for safety precautions but the contents of each drum were currently being used. Two additional drums contained hazardous waste labels, were marked "rinse" and "wash" and date April 8, 2014. The second set of drums, dated April 8, 2014, were the replacement drums and were empty. Mr. Sturdivant explained that the

rinse and wash drums were changed out every 30 days. However at the time this inspection the March drums were still in use.

10.3. Building 1200A Stabilization

The Stabilization Building (Pictures 27-28) receives the waste to be treated from PK1000. The waste is dumped into two concrete vault carbon steel vats to create the base recipe for treatment. The interior of the building required respirators and Tyvek™ suits, Mr. Sturdivant escorted Mr. Corey Holmes around the treatment floor for inspection (Pictures 25-33).

Outside the building the inspectors observed two dust control silos (Pictures 34-37). Inside the Silo#2 Baghouse building was two roll-offs filled with hazardous waste dust (Pictures 38-43). The inspectors observed dust and water on the ground around the roll-off. The inspectors stated the dust and water represented a housekeeping issue. Mr. Sturdivant explained that a work order was issued for the cleanup.

CWM Emelle is in apparent violation of Hazardous Waste Permit Condition I.C.4. In the event of noncompliance with this permit, the Permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment.

CWM Emelle is in apparent violation of Hazardous Waste Permit Condition V.E. Throughout the active life of the containment building, if the Permittee detects a condition that could lead to or has caused a release of hazardous waste, the Permittee must repair the condition promptly, in accordance with the following procedures and the requirements of ADEM Admin. Code R. 335-14-5-.30(2)(c)3.

In Silo#1 Baghouse building, the inspectors observed a covered roll-off with hazardous waste dust, the floor and the steel beam footings were covered in dust, about half the floor space had standing water and the corrugated metal walls were rusted along the bottom with holes (Pictures 44-59). The inspectors requested the inspection logs to determine when the housekeeping issues noted were last documented. A work order RWO#04911 was opened on April 15, 2014 for the removal of the water and dust. The work order was closed on April 16, 2014.

CWM Emelle is in apparent violation of Hazardous Waste Permit Condition I.C.4. In the event of noncompliance with this permit, the Permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment.

CWM Emelle is in apparent violation of Hazardous Waste Permit Condition V.E. Throughout the active life of the containment building, if the Permittee detects a condition that could lead to or has caused a release of hazardous waste, the Permittee must repair the condition promptly, in accordance with the following procedures and the requirements of ADEM Admin. Code R. 335-14-5-.30(2)(c)3.

10.4. Building 2200 Container Storage

Container Storage is an outdoor secondary containment area. PCB roll-offs are kept in bermed curbs and the hazardous and non-hazardous waste containers are placed in numbered slots

(Pictures 60-73). The storage area contained treated waste waiting on analytical results, waste that did not pass analytical results, waste waiting to be shipped out, and customer over-storage.

At the time of the inspection, the inspectors observed roll-off RO-41*199, with a treatment date of February 14, 2013, and a hazardous waste label with the words "hazardous waste solid, D006, D007, D008, F006 and F019, Profile 0303, Drum Process." When asked about the container, Mr. Sturdivant provided the waste treatment profile which identified that the roll-off had been incorrectly dated. The correct date for ongoing treatment was December 4, 2013.

10.5. Facility Maintenance Building 606

The facility maintenance is managed by Mr. Bill Young. Facility Maintenance houses the electricians and welders. The inspectors observed a parts washer (Picture 74), which is serviced by Safety Kleen, and located in the rear of the building. Next to the parts washer is a sand blaster that uses medium glass bead blast media (Picture 75). The spent blast media profile EMS 000302 has been determined by CWM Emelle to be non-hazardous. Outside rear of the building is a 35-gallon red flammable flip-top can used to collect empty aerosol cans (Pictures 76-77). The can was closed and labeled. No hazardous waste was observed inside the building.

10.6. Heavy Equipment Maintenance Building 300

The Heavy Equipment Maintenance Building houses tires, engine maintenance, trailers and hitches. The inspectors observed inside the shop a parts washer serviced by Safety Kleen; two 55-gallon hazardous waste drums that contained drained oil filters and used oil, waste oil, diesel and gasoline; an empty used oil container with extended funnel; and a red flammable can for spent aerosol cans (Picture 78-88). The inspectors instructed the CWM personnel to remove the funnel and close the open used oil container. Otherwise, all containers were observed closed and labeled.

Outside the shop was a 1,000-gallon used oil tank and a wire rack of spent lead acid batteries to be recycled (Pictures 89-91). No deficiencies were observed in this area.

10.7. Robbie D Wood Roll-Off Shop Building 402

The RDW Roll-off shop services the roll-offs and on-site trucks. At the time of the inspection, the inspectors observed a 55-gallon drum used to collect spent aerosol cans and a 55-gallon drum of used oil (Pictures 92-93). Both drums were labeled and closed.

10.8. Building 700 – Drum Management

Drum Management stores the drums waiting to be treated (Pictures 94-97). The drums are sorted and stored based on compatibility. The inspectors observed the drums to be closed, labeled and dated with the incoming generator date. Secondary containment was observed in place and the concrete floor had an impervious coating.

Building 700 also contained Dump 03 roll-off for non-hazardous waste that goes to the landfill (Picture 98); cement kiln dust that is brought in as product and used as filler in the drums; and an intake loading dock with two hazardous waste roll-offs (Pictures 99-102, 105). The black covered roll-off was from drum processing and was going to macro encapsulation. The red covered roll-off was from drum processing and was going to incineration. The roll-offs were closed and labeled.

Next to the black covered roll-off was a floor drain filled with rain water (Pictures 103-104). Mr. Coughlin assured the inspectors that the drain would be pumped out immediately.

10.9. Building 702 - Drum Processing

Drum Processing receives the incoming loads containing drums, containers and over packs (Picture 106-111) and stores them for up to two weeks. Each load is given a 10% random sample of each waste profile of each manifest. Every container is checked for 100% liquids and void spaces.

The samples are taken to the laboratory for fingerprint analysis. The facility has 72 hours to sample incoming containers. The results determine how the drums are managed. The coding for drum management is spray painted on the top of the drum along with the profile code. No liquids are allowed in the landfill.

Drums that contain 90% or more solids are disposed of in the landfill intact. Drum contents that are either non-hazardous or sufficiently treated to meet the Land Disposal Restrictions (LDR) require no additional treatment. Drums slated for treatment are placed on the enclosed conveyor system between Buildings 700 and 702 and sent to Building 700 for storage prior to treatment.

At the time of the inspection, the inspectors observed that a metal 55-gallon drum containing hazardous PCB contaminated solids, Unique ID 39816, had a hole in its side. The drum was closed and labeled with the words "Hazardous Waste" and "PCBs".

CWM Emelle is in apparent violation of Hazardous Waste Permit Condition III.J. If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, upon discovery, the Permittee shall immediately transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of ADEM Admin. Code R. 335-14-5-.09(2). CWM Emelle personnel placed the drum in an over pack container immediately upon discovery of the hole.

The remaining stored drums were closed, dated and labeled. No further issues were observed.

10.10. Groundwater Monitoring Wells

CWM Emelle's groundwater monitoring program currently consists of 49 groundwater monitoring wells. All groundwater monitoring wells observed at the time of the inspection appeared to be in good condition. The casing of each well was locked and clearly labeled with an identifying number.

10.11. Perimeter Fence

CWM Emelle's facility is surrounded by a chain-link perimeter fence designed to prevent unknowing and unauthorized access of people and livestock to the active portion of the facility. Appropriate warning signs were posted at regular intervals on the perimeter fence. No gaps in the fence were noted.

10.12. Building 604

TSCA and RCRA Drum Storage (Pictures 112-114) is sectioned by a fire wall to store incoming TSCA and RCRA wastes. Each load is given a 10% random sample of each waste profile of each manifest. Every container is checked for 100% free liquids and void spaces. At the time of the inspection, there were thirty-eight 55-gallon drums and five Gaylord boxes of TSCA and RCRA waste. Mr. Coughlin explained that the coated floor in this area will be replaced with welded steel sheets for added protection.

10.13. Building 600

Loads containing Toxic Substances Control Act (TSCA) waste are stored in Building 600 (Picture 115-126). The transformers are pulled apart and the contaminated oils are stored in Tanks 634 and 635 prior to going to the incinerator. The Clean Flush Tank 636 holds mineral oils and is used to flush clean the PCB contaminated equipment. Transformer flush goes to the PCB incinerator. When the equipment is tested below 50 PPM, it is disposed of in the landfill. TSCA equipment that comes into the facility already decontaminated is not retested.

The inspectors observed a PCB only parts washer, eight PCB capacitors, a flatbed with incoming drums and Gaylord boxes and a concrete PCB/RCRA organic waste intake berm that goes to the hazardous waste tanker located between Buildings 604 and 600. At the time of the inspection, the inspectors observed a stain on the floor outside of the berm (Pictures 127-129). The facility was unaware of the stain on the floor.

CWM Emelle is in apparent violation of Hazardous Waste Permit Condition I.C.4. In the event of noncompliance with this permit, the Permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment.

10.14. Building 603

The Container Storage Unit (Pictures 130-141) contained pallets, drums or totes that can not be treated or disposed of in the landfill. This waste is to be shipped to a reclamation facility [Mercury Waste Solutions (EPA ID #WIR000000356), Union Grove, Wisconsin] or an incinerator [(Veolia ES Technical Solutions-Trade Waste Incineration (Veolia-TWI) (EPA ID# ILD098642424), Sauget, Illinois and Veolia ES Technical Solutions (EPA ID# TXD000838896, Port Arthur, Texas)].

The inspectors observed drums marked as fuel reclaim, mercury devices in squat gray containers, spent lead acid batteries for reclamation and universal waste lamps generated by customers. All the containers were closed, labeled and dated.

10.15. Building 520 Hazardous Waste Tank

The Hazardous Waste Tank (Pictures 142-153) pumps into Tanker 08, which at the time of the inspection, was empty. The inspectors observed that the permitted hazardous waste tank had Subpart BB tags at the flanges and connections. Some of the tags were missing, and some were difficult to find and read because the tags were painted over. The inspectors recommend removing the paint from the painted over BB tags to make them more easily accessible. Mr. Rickey Burrell later provided a work order (RWO #04987) dated March 21, 2014 for five new BB tags.

The inspectors then climbed on top of the tank and inspected the vent and associated BB tags. On the ground the inspectors observed the hose connections inside a grated secondary containment structure.

The inspectors reviewed the Excel spreadsheet for the tank volume inventory. The tank was last emptied on April 14, 2014 and sent to Stabilization.

10.16. Building 602

Building 602 is used for drum and equipment storage. The inspectors observed old equipment, old capacitors, files and core samples (Pictures 154-157). No hazardous waste was observed in this area.

10.17. Building 900 Wheel Wash

The Wheel Wash is a wheel wash station used to prevent possible environmental contamination from vehicles and equipment (such as trucks and excavators) that operate in the active landfill (Pictures 158-168). Prior to exiting the landfill the vehicles are washed at Building 900. Wash water generated in this area is accumulated in a series of permitted hazardous waste tanks (Tank 901, Tank 902, Tank 903, and Tank 904 stored underground). These tanks are equipped with automatic leak detection systems.

The building is respirator restricted with warning sign on the door. Inside Building 900 was one roll-off container of hazardous waste sludge staged to collect waste washed from the wheels of the CWM vehicles. The roll-off was covered with a tarp, labeled with the words "Hazardous Waste", and marked with an accumulation start date. The truck bays were open and on top of the grated tank system that collects the wash water. No issues were observed in this area.

10.18. Subtitle C Landfill Trench 22

The current active cell in the landfill is Trench 22 with cells A thru D. Cells A and B are above grade and have temporary liners to minimize leachate. Cell C is at grade with a liner and Cell D has divider berm for active and inactive sides. Trench 23 is being developed.

The ADEM inspectors and Mr. Sturdivant dressed in Tyvek suits, rubber booties and respirators and went into Trench 22 at coordinate point L-K;6-7;230 to check that 20-25 drums of waste was being properly treated and disposed of (Pictures 169-181). No issues were observed.

10.19. Building 406 and 406 South

Building 406 is empty roll-off storage under a corrugated metal overhang on a dirt gravel lot (Picture 182).

Building 406 South is roll-off storage for 15 permitted slots to store mixed solidified hazardous waste that is waiting analysis for treatment stabilization. No liquids are allowed to be stored in these spaces (Pictures 183-192). At the time of the inspection, the inspectors observed that roll-off RO-38*145 was missing the start accumulation date on the hazardous waste label. The remaining roll-offs were closed, labeled and dated.

10.20. Tank Farm

Tank Farm 4 has four 500,000-gallon tanks and 12 250,000-gallon tanks. Tanks 1405-1411 and 1413-1416 have leachate solids. Three of the tanks (Tanks 1412, 1417 and 1419) contain treated leachate used for slurry in water stabilization, dust suppression in the landfill, and solidification. Tank 1418 processes the non-contaminated water accumulated in the sump. This tank is used for storage water. Contaminated sump water goes to the leachate tanks. Tank 1420 disperses water as needed. The secondary containment can hold 10% of the largest tank (500,000 gallons). All tanks were marked "Hazardous Waste". The levels of the tanks are checked by rolling balance, and the tanks are opened and closed by actuation valves.

At the time of the inspection, CWM Emelle explained that the recent tank painting was peeling from the exterior walls of Tank 1405 and that the floor epoxy was chipping and peeling in several places (Pictures 193-200). A work order for repair of the peeling paint was placed on January 17, 2014, which is less than a year after the entire secondary containment was painted.

The spray tanker area was also observed (Pictures 201-202). A new coat of impervious coating had recently been applied prior to the inspection and was drying. No issues were noted in this area.

10.21. Tanks 1703 – 1704

Tanks 1703 and 1704 receive leachate and pump the water to the Tank Farm (Pictures 203-206). The 250,000-gallon tanks are housed in an enclosed metal corrugated building with a concrete floor. Both tanks were labeled and the secondary containment area was clean. An in-floor sump was observed to be filled with brown water to be pumped back into the tank system. No issues were observed in this area.

10.22. Tanks 1701 – 1702

Tanks 1701 and 1702 receive raw leachate (Pictures 207-213). The 250,000 gallon tanks are housed in an enclosed metal corrugated building with a concrete floor. Both tanks were labeled and the secondary containment area was clean. At the time of the inspection, Tank 1701 had a polyvinyl chloride pipe leaking leachate above and on the tank. The leachate had caused staining on the tank. A work order (RWO #04916) was issued on April 16, 2014 to fix the leak. No other issues were observed in this area.

CWM Emelle is in apparent violation of Hazardous Waste Permit Condition I.C.4. In the event of noncompliance with this permit, the Permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment.

10.23. Trenches 16-21

A windshield tour of closed Trenches 16-21 was conducted (Pictures 214-221). No issues were observed in these areas.

10.24. Building 2000 Biological Treatment Unit

Building 2000 is a concrete-floored corrugated metal building that houses the biological treatment unit. The building contains three reactors (100,000 gallon and two 8,000-gallon reactors) which are an on-site wastewater treatment plant in which the leachate removed from

Trench 22 is treated (Pictures 222-225). According to CWM staff, clean water removed from the biological treatment unit is used as a dust suppressant in Trench 22.

During a previous compliance evaluation inspection (which was performed on April 2, 2012) ADEM inspectors noted that water was infiltrating into the building through the building's eastern wall. At the time of the inspection, Mr. Sturdivant stated that CWM Emelle personnel were still working to address the infiltration of water into the building through its eastern wall. CWM Emelle has not yet developed a final solution to the issue.

The Biological Treatment Unit is considered a confined space because it produces hydrogen sulfide gas and the ADEM inspectors and the CWM Emelle staff wore respirators to stand in the doorway of the unit. No other issues were noted in this area.

Records Review

Concurrent with the walkthrough, Mrs. Linda Knickerbocker and Mrs. Lynn Roper, ADEM reviewed the training records, the Inspection Records, open work orders, Burial Coordinate Log, Closure/Post-Closure Plans, the Contingency Plan, Waste Analysis Plan, Waste Approval Plan, Waste Minimization Plan, and the 2013 hazardous, non-hazardous, used oil and the universal waste manifests. The generator status notification (EPA form 8700-12) was last updated February 7, 2014.

The CWM Emelle staff received Annual Refresher training course on June 6, 2013. The job titles and the job descriptions were reviewed. No deficiencies were observed.

The Inspection Records for Hazardous Waste Storage, Leak Detection and Repair Program, Hazardous Waste Tank and Landfill Caps were reviewed for 2013. Open work order RWO#04829 was also reviewed. No deficiencies were observed.

The inspectors reviewed the Burial Coordinate Log for Trench 22 Active Cell Section L-K; Section 6-7 at 230 feet for 20-25 drums placed in this area. Earlier visual inspection of the cell confirmed the log review. No deficiencies were observed.

Closure/Post-Closure Plans were reviewed. The inspectors reviewed the Certificate of Liability dated for November 15, 2013 to November 14, 2014, and the Certificate of Insurance for Closure and/or Post-Closure Care. No deficiencies were observed.

The Contingency Plan was reviewed. The primary and secondary contacts work addresses were included, and the evacuation plan was up to date. The fire extinguisher locations, emergency equipment inventory, the evacuation plan and maps, Spill Prevention Control and Countermeasure Plan and Security Plan were reviewed. No deficiencies were observed.

The Waste Analysis Plan, Waste Approval Plan, and Waste Minimization Plan were reviewed. No deficiencies were observed.

The hazardous and non-hazardous waste outbound manifests and land disposal forms for March, July and November 2012, and January, April and December 2013 were reviewed. The originator,

outbound and returned rejected loads manifests for June, August and October 2013 were reviewed. Randomly selected incoming manifests for May, September, October and December 2013 and January and March 2014 were reviewed. No deficiencies were observed.

The closing conference was held with representatives of CWM Emelle, ADEM and the EPA, and the deficiencies noted in this report were discussed.

11) Signed

Paula A. Whiting, Inspector — Date: 9/2/14

12) Concurrence

Larry L. Lamberth — Date: 09/02/14
Chief, South Enforcement and Compliance Section
RCRA and OPA Enforcement and Compliance Branch

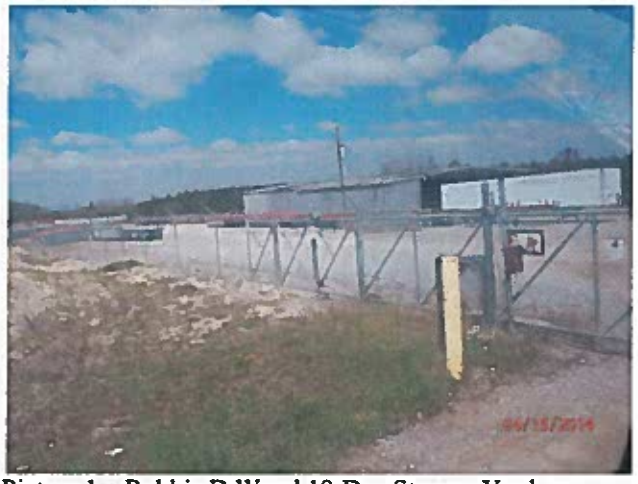
ATTACHMENT A

CHEMICAL WASTE MANAGEMENT

EMELLE, ALABAMA

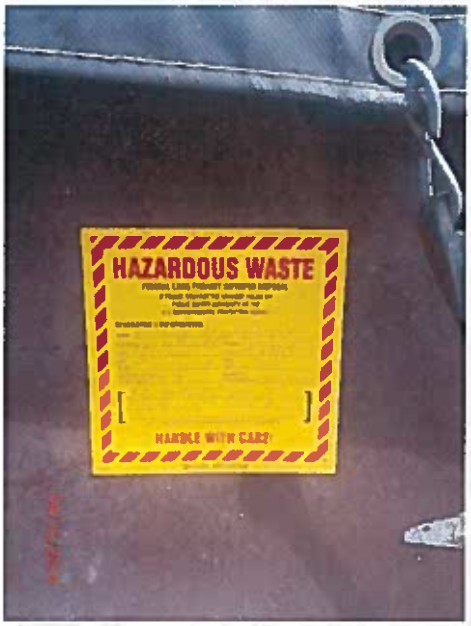
COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS

APRIL 15-17, 2014



Picture 1 – Robbie D Wood 10-Day Storage Yard

Picture 4 – RDW 10-Day Storage Yard roll-off

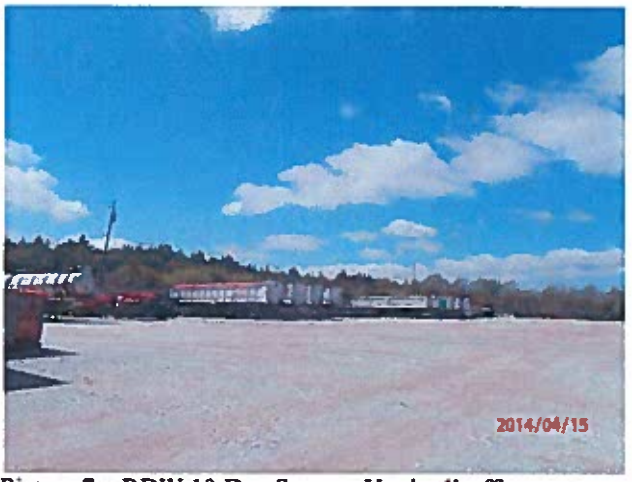


Picture 2 – RDW 10-Day Storage Yard roll-off label

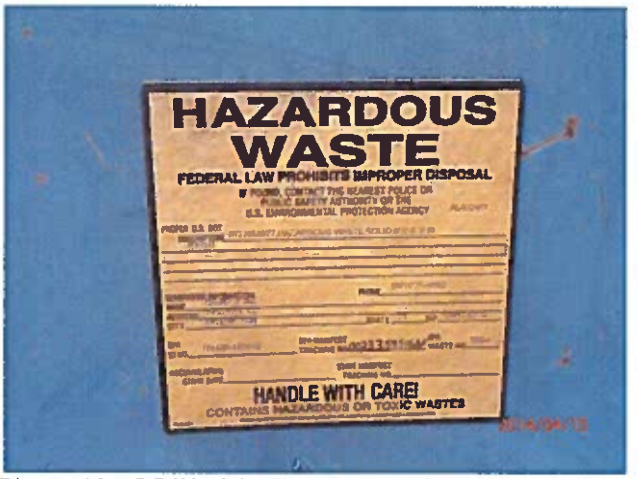
Picture 5 – RDW 10-Day Storage Yard hangar

Picture 3 – RDW 10-Day Storage Yard roll-off

Picture 6 – RDW 10-Day Storage Yard roll-offs

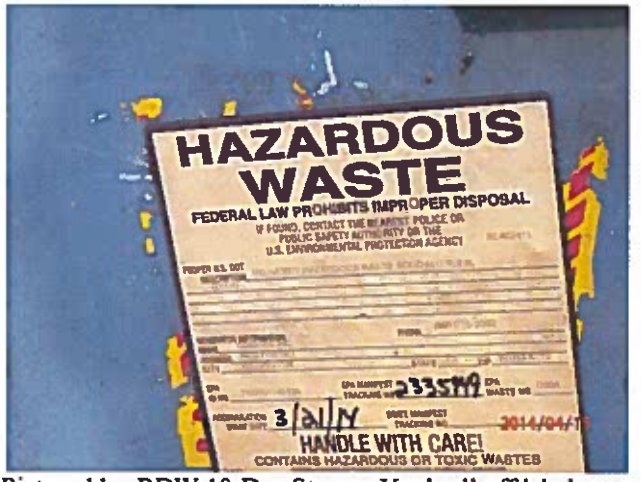


Picture 7 – RDW 10-Day Storage Yard roll-offs

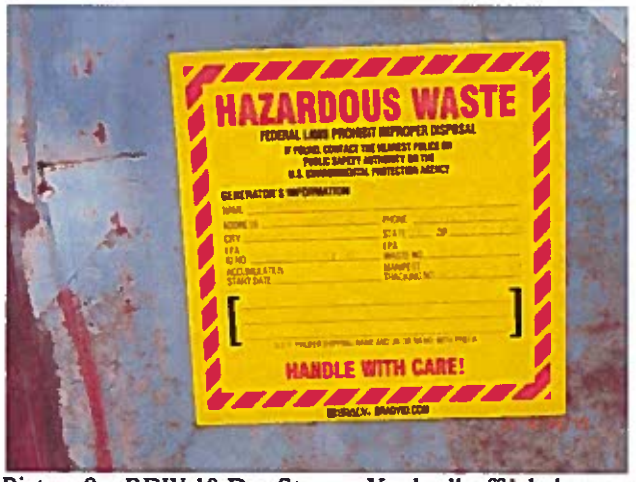


Picture 10 – RDW 10-Day Storage Yard roll-off label

Picture 8 – RDW 10-Day Storage Yard roll-off



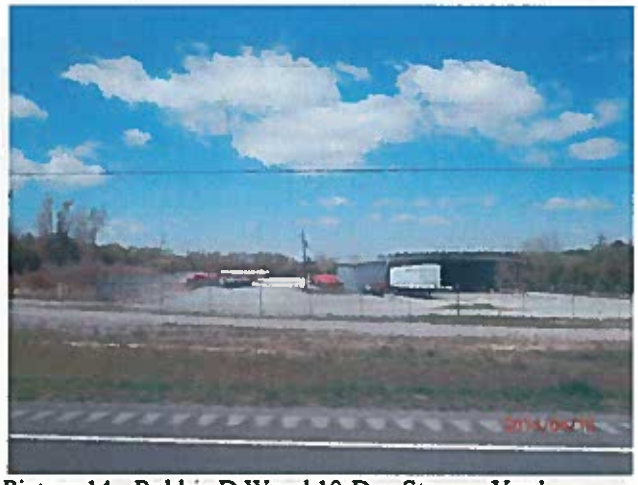
Picture 11 – RDW 10-Day Storage Yard roll-off label



Picture 9 – RDW 10-Day Storage Yard roll-off label

Picture 12 – RDW 10-Day Storage Yard roll-off label

Picture 13 - Robbie D Wood 10-Day Storage Yard



Picture 14 - Robbie D Wood 10-Day Storage Yard

Picture 15 – PK100 Bulk Sampling Area

Picture 16 – PK100 Bulk Sampling Area

Picture 17 – PK100 Bulk Sampling Area trucks idling

Picture 18 – PK100 Bulk Sampling Area truck idling

Picture 19 – PK100 Bulk Sampling Area new wash/rinse drums

Picture 20 – PK100 Bulk Sampling Area used wash/rinse drums

Picture 21 – PK100 Bulk Sampling Area used wash/rinse drums

Picture 22 – PK100 Bulk Sampling Area used wash drum label

Picture 23 – PK100 Bulk Sampling Area used rinse drum label

Picture 24 – PK100 Bulk Sampling Area new wash/rinse drums

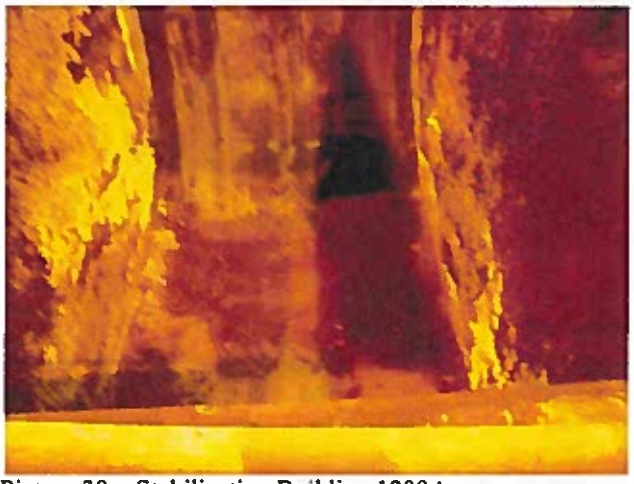
Picture 25 – Stabilization Building 1200A

Picture 26 – Stabilization Building 1200A

Picture 27 – Stabilization Building 1200A

Picture 28 – Stabilization Building 1200A

Picture 29 – Stabilization Building 1200A



Picture 30 – Stabilization Building 1200A

Picture 31 – Stabilization Building 1200A

Picture 32 – Stabilization Building 1200A

Picture 33 – Stabilization Building 1200A

Picture 34 – Stabilization Building 1200A

Picture 35 – Stabilization Building 1200A Silo#2

Picture 36 – Stabilization Building 1200A Silo#1

Picture 37 – Stabilization Building 1200A Silo#2

Picture 38 – Stabilization Dust Control Silo#2 roll-off

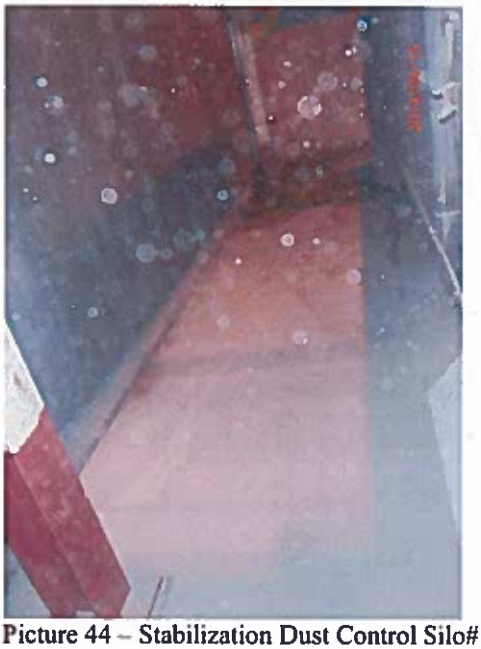
Picture 39 – Stabilization Dust Control Silo#2 dust mud

Picture 40 – Stabilization Dust Control Silo#2 dust mud

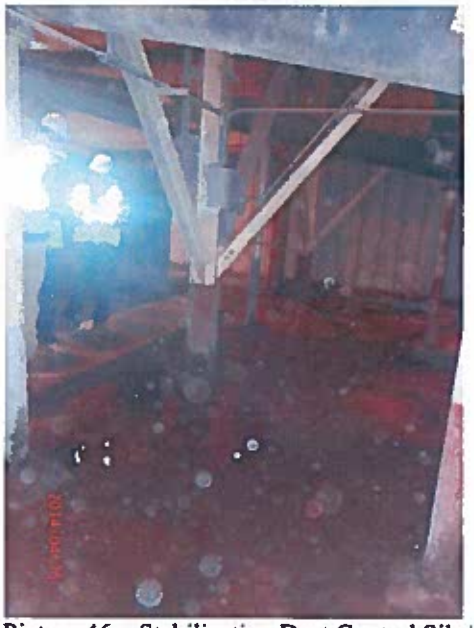
Picture 41 – Stabilization Dust Control Silo#2 building with holes in the side

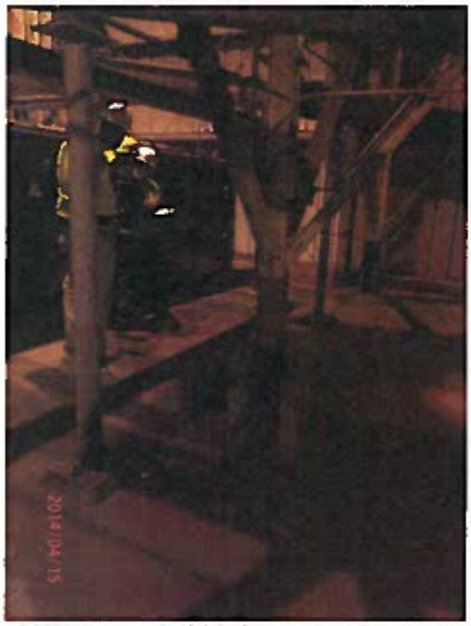
Picture 42 – Stabilization Dust Control Silo#2 roll-off label

Picture 43 – Stabilization Dust Control Silo#2 roll-off label


Picture 44 – Stabilization Dust Control Silo#1 floor covered in dust


Picture 45 – Stabilization Dust Control Silo#1 floor covered in dust and water


Picture 46 – Stabilization Dust Control Silo#1 floor covered in dust and water



Picture 47 – Stabilization Dust Control Silo#1 floor covered in dust and water

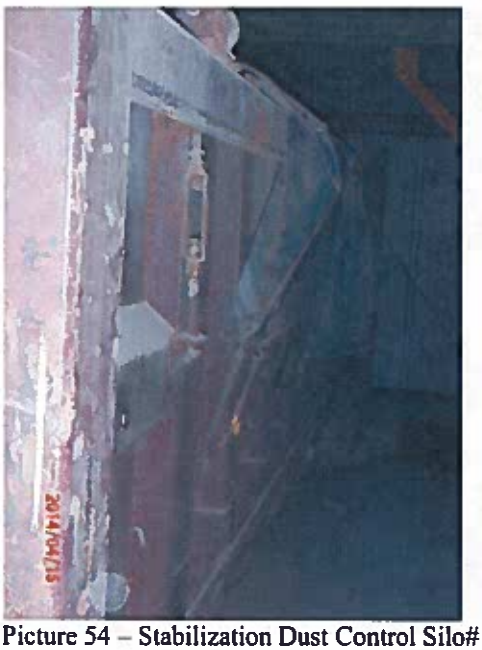
Picture 48 – Stabilization Dust Control Silo#1 building sides with holes

Picture 49 – Stabilization Dust Control Silo#1 floor covered in dust

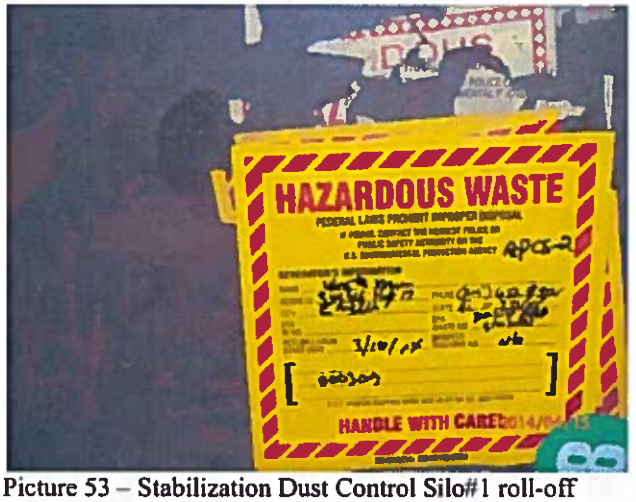
Picture 50 – Stabilization Dust Control Silo#1 floor covered in dust

Picture 51 – Stabilization Dust Control Silo#1 floor covered in dust

Picture 52 – Stabilization Dust Control Silo#1 roll-off



Picture 54 – Stabilization Dust Control Silo#1 roll-off



Picture 53 – Stabilization Dust Control Silo#1 roll-off label

Picture 55 – Stabilization Dust Control Silo#1 steel footing covered in dust

Picture 56 – Stabilization Dust Control Silo#1 floor covered in dust

Picture 59 – Stabilization Dust Control Silo#1 steel beam footings covered in dust

Picture 57 – Stabilization Dust Control Silo#1 floor covered in water

Picture 60 – Building 2200 Container Storage

Picture 58 – Stabilization Dust Control Silo#1 floor covered in dust and water

Picture 61 – Building 2200 Container Storage

Picture 62 – Building 2200 Container Storage

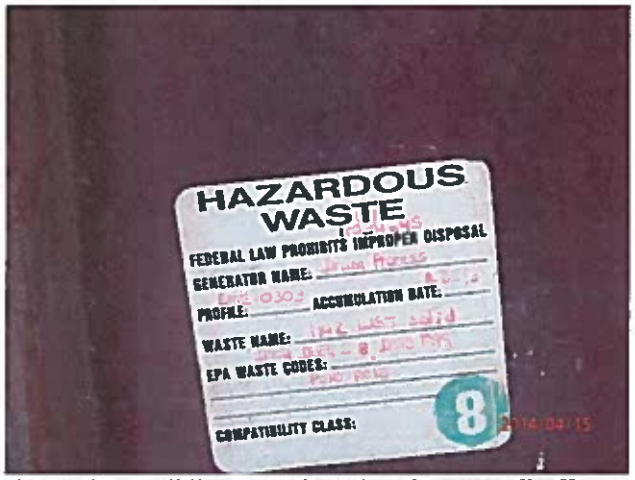
Picture 63 – Building 2200 Container Storage

Picture 64 – Building 2200 Container Storage

Picture 65 – Building 2200 Container Storage

Picture 66 – Building 2200 Container Storage roll-off label

Picture 67 – Building 2200 Container Storage roll-off



Picture 68 – Building 2200 Container Storage roll-off label past accumulation start date

Picture 69 – Building 2200 Container Storage roll-off

Picture 70 – Building 2200 Container Storage roll-off label near accumulation start date

Picture 71 – Building 2200 Container Storage roll-off

Picture 72 – Building 2200 Container Storage roll-off label with wrong date

Picture 73 – Building 2200 Container Storage roll-off label with wrong date

Picture 74 – Facility Maintenance Building 606

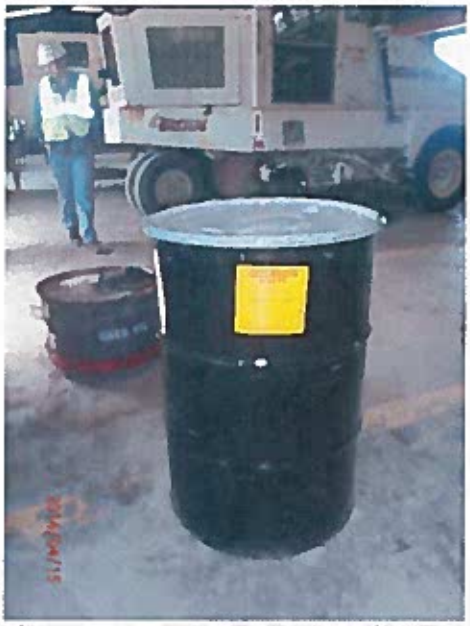
Picture 75 – Facility Maintenance sand blaster


Picture 76 – Facility Maintenance spent aerosol can container

Picture 77 – Facility Maintenance spent aerosol can container

Picture 78- Heavy Equipment Maintenance oil dry clean up

Picture 79 – Heavy Equipment Maintenance HW drum



Picture 80 – Heavy Equipment Maintenance HW drum

Picture 81 – Heavy Equipment Maintenance HW drum label

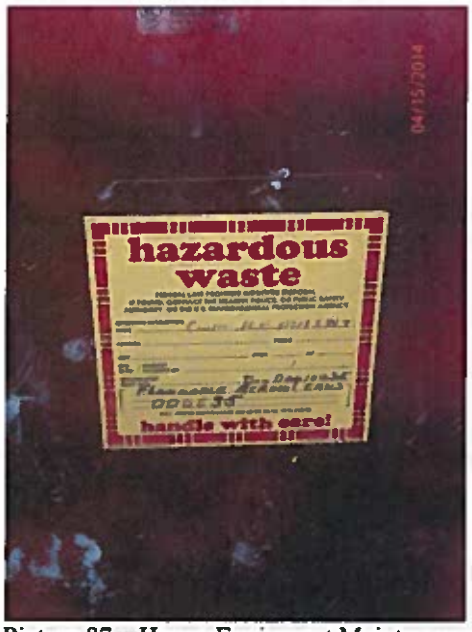
Picture 82 – Heavy Equipment Maintenance HW drum label


Picture 83 – Heavy Equipment Maintenance HW drums

Picture 84 – Heavy Equipment Maintenance used oil drum


Picture 85 – Heavy Equipment Maintenance used oil drum


Picture 86 – Heavy Equipment Maintenance spent aerosol can container



Picture 87 – Heavy Equipment Maintenance spent aerosol container label

Picture 88 – Heavy Equipment Maintenance spent aerosol can container

Picture 89 – Heavy Equipment Maintenance used oil tank

Picture 90 – Heavy Equipment Maintenance used oil tank

Picture 91 – Heavy Equipment Maintenance used batteries for recycling

Picture 93 – RDW Roll-off Shop Building 402 used oil drum

Picture 92 – RDW Roll-off Shop Building 402 HW drum

Picture 94 – Building 700 Storage

Picture 95 – Building 700 Storage

Picture 96 – Building 700 Storage

Picture 99 – Building 700 Intake Loading Dock

Picture 97 – Building 700 Storage

Picture 100 – Building 700 Intake Loading Dock

Picture 98 – Building 700 Dump 03 Roll-off

Picture 101 – Building 700 Intake Loading Dock

Picture 102 – Building 700 Intake Loading Dock roll-off label

Picture 105 – Building 700 Intake Loading Dock roll-off label

Picture 103 – Building 700 Intake Loading Dock floor drain

Picture 106 – Building 702

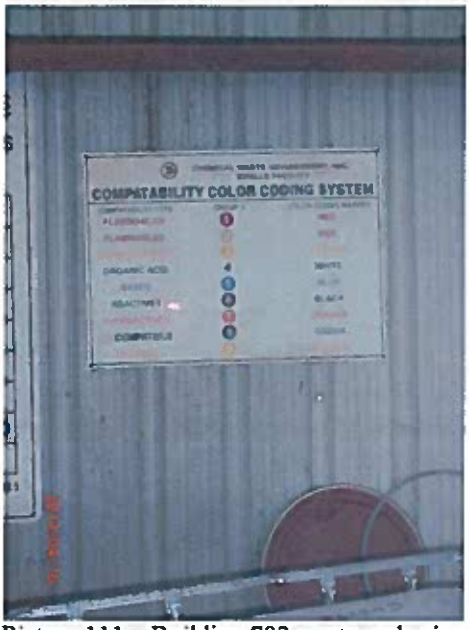
Picture 104 – Building 700 Intake Loading Dock floor drain

Picture 107 – Building 702

Picture 108 – Building 702

Picture 109 – Building 702

Picture 110 – Building 702 waste code sign



Picture 111 – Building 702 waste code sign

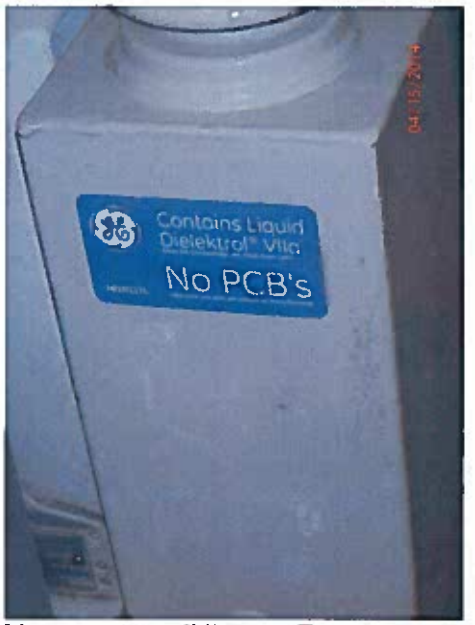
Picture 112 – Building 604 TSCA/RCRA drum storage

Picture 113 – Building 604 TSCA/RCRA drum storage

Picture 114 – Building 604 TSCA/RCRA drum storage

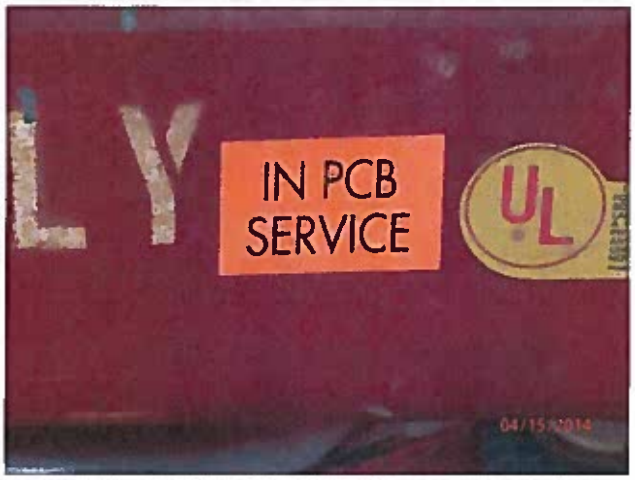
Picture 115 – Building 600 TSCA Storage

Picture 116 – Building 600 TSCA Storage capacitors



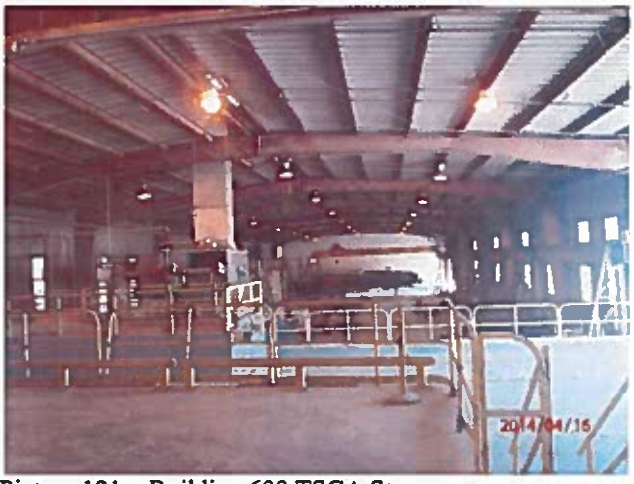
Picture 117 – Building 600 TSCA Storage capacitor label

Picture 118 – Building 600 TSCA Storage parts washer



Picture 119 – Building 600 TSCA Storage parts washer label

Picture 120 – Building 600 TSCA Storage parts washer



Picture 121 – Building 600 TSCA Storage

Picture 122 – Building 600 TSCA Storage


Picture 123 – Building 600 TSCA Storage


Picture 124 – Building 600 TSCA Storage

Picture 125 – Building 600 TSCA Storage

Picture 126 – Building 600 TSCA Storage

Picture 127 – Building 600 TSCA Storage organic waste pit

Picture 128 – Building 600 TSCA Storage organic waste pit

Picture 129 – Building 600 TSCA Storage organic waste pit floor stain

Picture 130 – Building 603 RCRA drum service storage

Picture 131 – Building 603 RCRA drum service storage

Picture 134 – Building 603 RCRA drum service storage

Picture 132 – Building 603 RCRA drum service storage

Picture 135 – Building 603 RCRA drum service storage

Picture 133 – Building 603 RCRA drum service storage

Picture 136 – Building 603 RCRA drum service storage

Picture 137 – Building 603 RCRA drum service storage


Picture 138 – Building 603 RCRA drum service storage

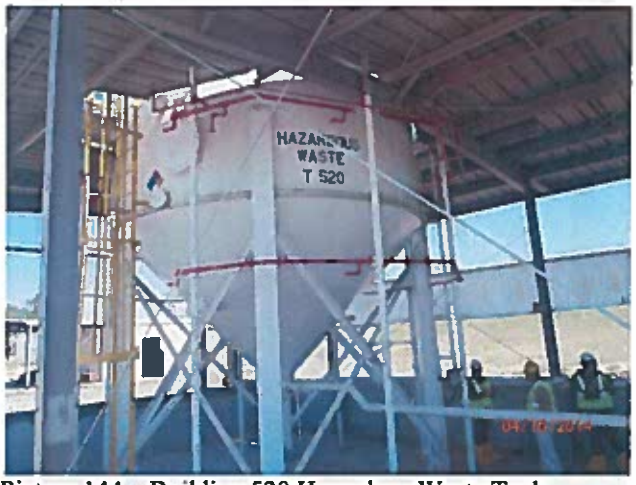

Picture 139 – Building 603 RCRA drum service storage

Picture 140 – Building 603 RCRA drum service storage


Picture 141 – Building 603 RCRA drum service storage

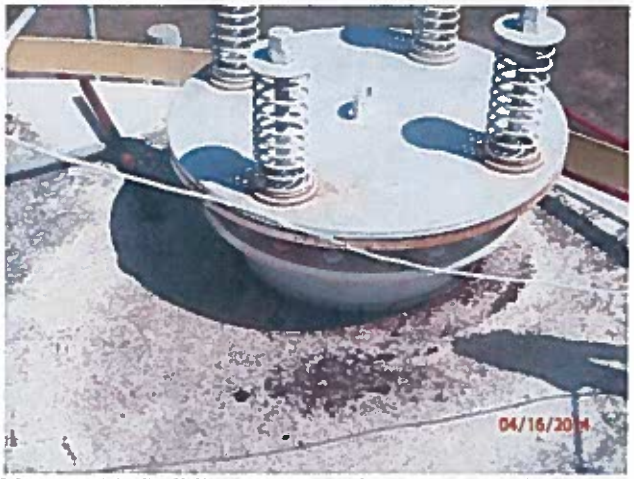
Picture 142 – Building 520 Hazardous Waste Tank

Picture 143 – Building 520 Hazardous Waste Tank



Picture 144 – Building 520 Hazardous Waste Tank


Picture 145– Building 520 Hazardous Waste Tank top



Picture 146– Building 520 Hazardous Waste Tank top

Picture 147– Building 520 Hazardous Waste Tank connections

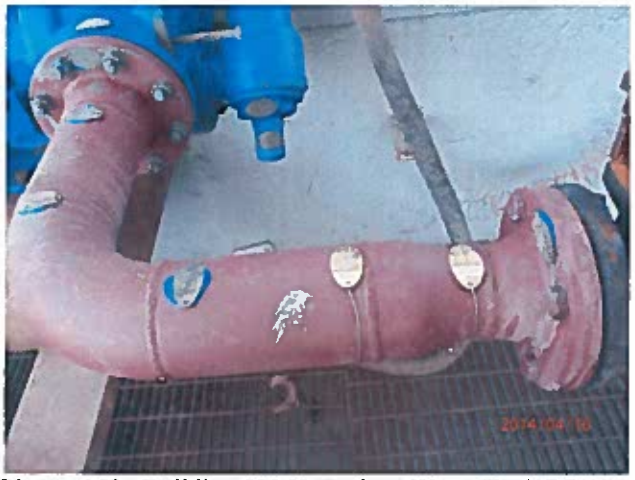
Picture 148 – Building 520 Hazardous Waste Tank

Picture 149 – Building 520 Hazardous Waste Tank BB tags

Picture 150– Building 520 Hazardous Waste Tank BB tags

Picture 151 – Building 520 Hazardous Waste Tank flanges

Picture 152 – Building 520 Hazardous Waste Tank connections



Picture 153– Building 520 Hazardous Waste Tank BB tags

Picture 154 – Building 602 Drum/Equipment Storage

Picture 155 – Building 602 Drum/Equipment Storage

Picture 156 – Building 602 Drum/Equipment Storage

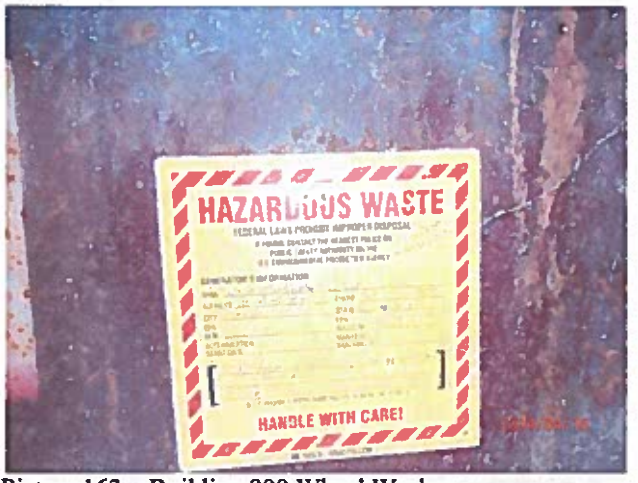
Picture 157 – Building 602 Drum/Equipment Storage

Picture 158 – Building 900 Wheel Wash

Picture 159 – Building 900 Wheel Wash


Picture 162 – Building 900 Wheel Wash


Picture 160 – Building 900 Wheel Wash



Picture 163 – Building 900 Wheel Wash

Picture 161 – Building 900 Wheel Wash


Picture 164 – Building 900 Wheel Wash

Picture 165 – Building 900 Wheel Wash

Picture 166 – Building 900 Wheel Wash

Picture 167 – Building 900 Wheel Wash

Picture 168 – Building 900 Wheel Wash

Picture 169 – Hazardous Waste Landfill Trench 22

Picture 170 – Hazardous Waste Landfill Trench 22

Picture 171 – Hazardous Waste Landfill Trench 22

Picture 174 – Hazardous Waste Landfill Trench 22

Picture 172 – Hazardous Waste Landfill Trench 22

Picture 175 – Hazardous Waste Landfill Trench 22

Picture 173 – Hazardous Waste Landfill Trench 22

Picture 176 – Hazardous Waste Landfill Trench 22

Picture 177 – Hazardous Waste Landfill Trench 22

Picture 180 – Hazardous Waste Landfill Trench 22

Picture 178 – Hazardous Waste Landfill Trench 22

Picture 181 – Hazardous Waste Landfill Trench 22

Picture 179 – Hazardous Waste Landfill Trench 22

Picture 182 – Building 406 Roll-off Storage

Picture 183 – Building 406 South Roll-off Storage label

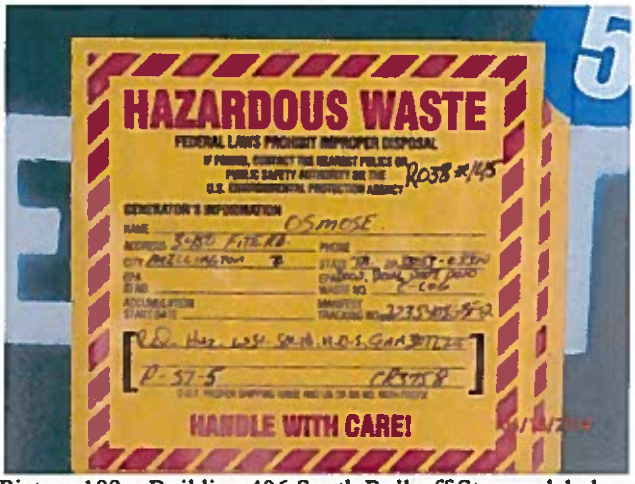
Picture 186 – Building 406 South Roll-off Storage

Picture 184 – Building 406 South Roll-off Storage

Picture 187 – Building 406 South Roll-off Storage label

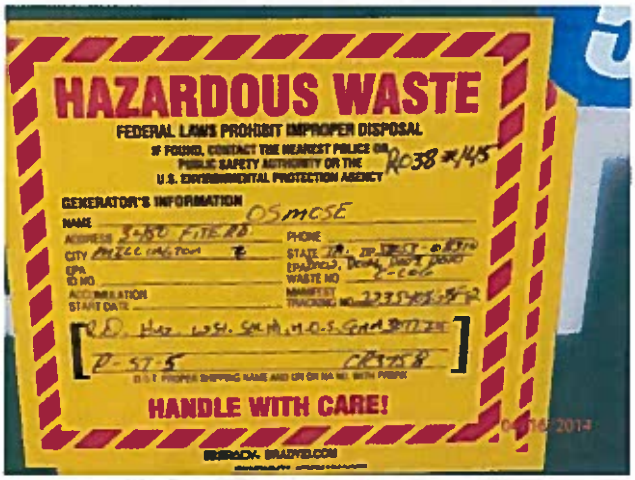
Picture 185 – Building 406 South Roll-off Storage

Picture 188 – Building 406 South Roll-off Storage



Picture 189 – Building 406 South Roll-off Storage label


Picture 192 – Building 406 South Roll-off Storage



Picture 190 – Building 406 South Roll-off Storage label


Picture 193 – Tank Farm floor epoxy peeling

Picture 191 – Building 406 South Roll-off Storage

Picture 194 – Tank Farm floor epoxy peeling

Picture 195 – Tank Farm

Picture 196 – Tank Farm

Picture 197 – Tank Farm tank peeling

Picture 198 – Tank Farm tank peeling

Picture 199 – Tank Farm tank peeling

Picture 200 – Tank Farm tank peeling

Picture 201 – Tank Farm spray tanker

Picture 202 – Tank Farm spray tanker

Picture 203 – Tanks 1703-1704

Picture 204 – Tanks 1703-1704


Picture 205 – Tanks 1703-1704


Picture 206 – Tanks 1703-1704

Picture 207 – Tanks 1701-1702


Picture 210 – Tanks 1701-1702


Picture 208 – Tanks 1701-1702


Picture 211 – Tanks 1701-1702


Picture 209 – Tanks 1701-1702

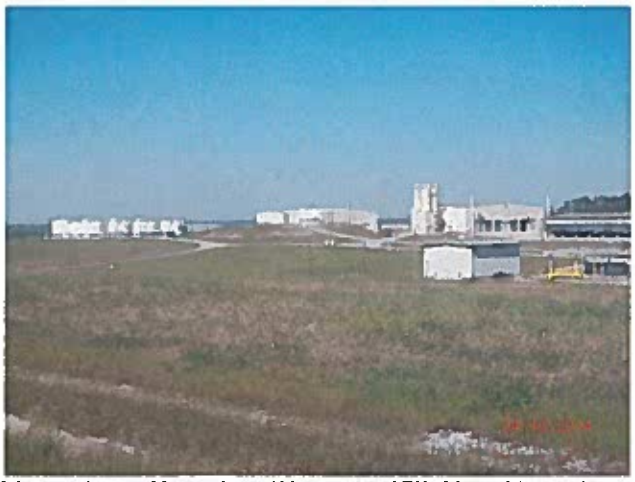

Picture 212 – Tanks 1701-1702

Picture 213 – Tanks 1701-1702

Picture 216 – Hazardous Waste Landfill Closed Trench

Picture 214 – Hazardous Waste Landfill Closed Trench

Picture 217 – Hazardous Waste Landfill Closed Trench



Picture 215 – Hazardous Waste Landfill Closed Trench

Picture 218 – Hazardous Waste Landfill Closed Trench

Picture 219 – Hazardous Waste Landfill Closed Trench

Picture 222 – Building 2000 Biological Treatment Unit

Picture 220 – Hazardous Waste Landfill Closed Trench

Picture 223 – Building 2000 Biological Treatment Unit

Picture 221 – Hazardous Waste Landfill Closed Trench

Picture 224 – Building 2000 Biological Treatment Unit

Picture 225 – Building 2000 Biological Treatment Unit